

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Melvin Torres
Debtor

Rushmore Servicing as servicer for
U.S. Bank National Association, not in
its individual capacity but solely as
trustee for RMTP Trust, Series 2021
Cottage-TT-V
v.

Melvin Torres
Scott F. Waterman - Bankruptcy
Trustee
Respondents

CASE NO.: 20-10747-pmm

CHAPTER 13

Judge: Patricia M. Mayer

Hearing Date: April 2, 2024 at 10:00AM

Objection Deadline: March 25, 2024

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY

PLEASE TAKE NOTICE, that Rushmore Servicing as servicer for U.S. Bank National Association, not in its individual capacity but solely as trustee for RMTP Trust, Series 2021 Cottage-TT-V (on behalf of itself and together with any successor and/or assign “Movant”), filed a Motion for Relief from the Automatic Stay with respect to the property located at 63w Madison St, Mohnton, PA 19540.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before March 23, 2024 you or your attorney must do all of the following:

- (a) file an answer explaining your position at
United States Bankruptcy Court
Eastern District of Pennsylvania
The Gateway Building
201 Penn Street, 4th Floor
Reading, PA 19601

If you mail your answer to the bankruptcy clerk’s office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's attorney:

Lauren Moyer
Friedman Vartolo, LLP
1325 Franklin Avenue, Suite 160
Garden City, NY 11530
Phone: (212) 471-5100
Fax: (212) 471-5150
Bankruptcy@FriedmanVartolo.com

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Judge Patricia M. Mayer at The Gateway Building, 201 Penn Street, 4th Floor, Reading, PA 19601 on April 2, 2024 at 10:00AM, unless otherwise ordered by the Court.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (610) 208-5030 to find out whether the hearing has been canceled because no one filed an answer.

Dated: March 8, 2024

By: /s/ Lauren Moyer
Lauren Moyer, Esq.
FRIEDMAN VARTOLO LLP
Attorneys for Rushmore Servicing as servicer for
U.S. Bank National Association, not in its
individual capacity but solely as trustee for RMTP
Trust, Series 2021 Cottage-TT-V
1325 Franklin Avenue, Suite 160
Garden City, NY 11530
T: (212) 471-5100
F: (212) 471-5150
Bankruptcy@FriedmanVartolo.com

TO:

Melvin Torres
63 West Madison Street
Mohnton, PA 19540
Bankruptcy Debtor

Rolando Ramos-Cardona
2901 St. Lawrence Avenue, Suite 100
Reading, PA 19606
Attorney

Scott F. Waterman
2901 St. Lawrence Avenue, Suite 100
Reading, PA 19606
Bankruptcy Trustee

Gellert S. David
3506 Perkiomen Avenue
Reading, PA 19606
Attorney

United States Trustee
Robert N.C. Nix Federal Building - Suite 320, 900 Market Street
Philadelphia, PA 19107
United States Trustee